

iGeneral Counsel, P.C.

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Admitted in AZ, CA, MA, VA

July 17, 2018

BY HAND DELIVERY

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street, Room 6124, Unit 26
Wilmington, DE 19801-3556

Re: International Business Machines Corp. v. Groupon, Inc., C.A. No. 16-122 (LPS)

Dear Chief Judge Stark,

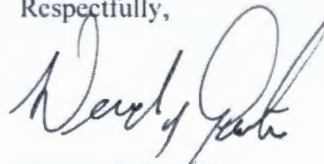
I write on behalf of non-party WebMD Health Corp. ("WebMD") which is a party to that certain License Agreement dated June 26, 2015 (the "License") with plaintiff International Business Machines Corporation ("IBM"), which WebMD understands may be disclosed during the trial in this matter. Counsel was retained by WebMD yesterday in connection with WebMD's interests in protecting from disclosure certain highly confidential, commercially sensitive information within the License.

WebMD is aware of Your Honor's instructions at the hearing held on July 13, 2018 in connection with applications made by several similarly situated non-parties for protective orders regarding their respective licensing agreements. Accordingly, I write to inform the Court that WebMD is in the process of contacting counsel for the parties so that it can participate in the meet-and-confer process ordered by the Court in order to ensure that WebMD's confidential and commercially sensitive information is protected.

WebMD looks forward to working with those parties to propose appropriate redactions and other mechanisms to protect limited highly sensitive portions of the License from public dissemination.

I am available at the Court's convenience to address any questions regarding this matter.

Respectfully,



Wendy E. Giberti